CARLISLE
CATHEDRAL

ANTI-BRIBERY & CORRUPTION POLICY

INTRODUCTION

Carlisle Cathedral values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its affairs. The actions and conduct of Cathedral staff as well as others acting on the Cathedral's behalf are key to maintaining these standards.

The purpose of this document is to set out the Cathedral's policy in relation to bribery and corruption. This policy applies strictly to all persons working for us or on our behalf in any capacity, including staff at all levels, trustees, directors, managers, staff, casual staff, volunteers, self-employed, contractors, external consultants, third-party representatives, and business partners and to any other people or bodies associated with the Cathedral, within all regions, areas and functions.

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1. UNDERSTANDING AND RECOGNISING BRIBERY AND CORRUPTION

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery. Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

1.1. Penalties

Under the Bribery Act 2010, bribery by individuals can result in imprisonment and/or a fine.

If the Cathedral is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face a fine.

A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the Cathedral.

1.2. Cathedral policy

Carlisle Cathedral will not tolerate bribery or corruption in any form.

The Cathedral prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- to or from any person or company wherever located, whether a public official or public body, or a private person or company;
- by any individual employee, trustee, director, agent, consultant, contractor or other person or body acting on the Cathedral's behalf;
- in order to gain any commercial, contractual or regulatory advantage for the Cathedral in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- normal hospitality;
- fast tracking a process which is available to all dependent upon necessity;
- providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only.

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to your Line Manager. If necessary, guidance should also be sought from the COO.

The Cathedral will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

1.3. Key risk areas

Bribery can be a risk in several areas of the Cathedral. Below are the key areas you should be aware of in particular:

Excessive gifts, entertainment and hospitality: can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are acceptable provided they fall within reasonable boundaries. Please refer to the Income Generation Policy for more information.

Facilitation payments: are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right. The Cathedral will not tolerate or excuse such payments being made.

Reciprocal agreements: or any other form of 'quid pro quo' is never acceptable unless they are legitimate business arrangements which are properly documented and approved by senior management. Improper payments to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.

Actions by third parties for which the Cathedral may be held responsible: can include a range of people, i.e. agents, contractors and consultants, acting on the Cathedral's behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorised and recorded.

We have robust record-keeping controls in place so that our records are accurate and transparent, reducing the risk of exploitation or the concealment of bribes and/or corrupt practices.

2. YOUR RESPONSIBILITIES & HOW TO RAISE A CONCERN

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the Cathedral. If you become aware of, or suspect that, an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this.

Any such incidents should be reported in accordance with the Cathedral's Whistle blowing Policy or to the COO or the Dean. Should the concern be regarding an ordained member of the Chapter/staff, the incident will be dealt with through the Clergy Discipline Measure 2003.

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Relevant members of staff within Finance and the Development office are familiar with this policy and the wider aspects of anti-bribery and corruption. However, all staff are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

REVIEW OF THIS POLICY

- The policy will be reviewed at least every two years.
- Please refer to the ALL STAFF shared area within the Cathedral's IT system to view the most recent version. If you do not have access (e.g. café staff), please ask your Line Manager who will provide you with the most recent version of this policy.
- This policy will also be placed on the Cathedral website.

Re-adopted by Chapter: December 2024
Reviewed by the Finance Committee: June 2026
Re-adopted by Audit and Risk Committee: September 2026
Date of next review - 2028